



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 23 2015

**CERTIFIED MAIL 70091680000076779395**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Mr. Gene Fahrney  
Plant Superintendent  
Baker Manufacturing Company, LLC  
133 Enterprise Street  
Evansville, Wisconsin 53536

Re: Notice of Violation  
Compliance Evaluation Inspection  
WID006072979

Dear Mr. Fahrney:

On February 27, 2015, a representative of the U.S. Environmental Protection Agency inspected the Baker Manufacturing Company, LLC facility located in Evansville, Wisconsin (Baker). As a generator of universal waste and used oil, Baker is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Baker's compliance with certain provisions of RCRA. A copy of the inspection report is enclosed for your reference.

Based on information provided by Baker, EPA's review of records pertaining to Baker, and the inspector's observations, EPA has determined that Baker violated RCRA requirements related to used oil and universal waste, as described in paragraphs 1- 5, below.

1. Used Oil Requirement

Under Wis. Admin. Code § NR 679.22(3)(a) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, one 300-gallon tote and eight 55-gallon containers of used oil, located in Baker's Bldg. # 20 used oil storage area, and 300-gallon tote of used coolant in Bldg. #5, were not labeled with the words, "Used Oil."

2. Universal Waste Requirement

Under Wis. Admin. Code § NR 673.14(5) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste must label or clearly mark each lamp or a container or package



in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

Baker is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time.

At the time of the inspection, Baker's container of four foot lamps was not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

### 3. Universal Waste Requirement

Under Wis. Admin. Code § NR 673.13(4)(a) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must contain used lamps in containers or packages that are closed.

Baker is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time.

At the time of the inspection, Baker's containers accumulating four foot and eight foot lamps was not closed.

### 4. Universal Waste Requirement

Under Wis. Admin. Code § NR 673.14(1) [40 C.F.R. § 273.14(a)], a small quantity handler of universal waste must label or clearly mark each battery or a container or package in which such batteries are contained with any one of the following phrases: "Universal Waste-Batteries," "Waste Batteries" or "Used Batteries."

Baker is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time.

At the time of the inspection, Baker's container of used batteries located in Bldg. #5 was not labeled with the phrase "Universal Waste-Batteries," "Waste Batteries" or "Used Batteries."

### 5. Universal Waste Requirement

Under Wis. Admin. Code § NR 673.15(1) [40 C.F.R. § 273.15(1)], a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste was generated.

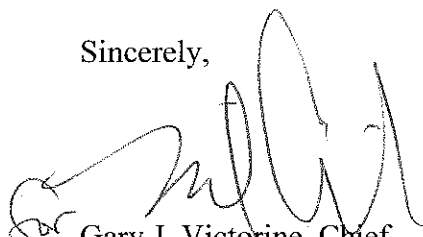
Baker is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time.

At the time of the inspection, Baker last offered its universal waste for off-site shipment on 04/24/2012, and more than year has passed since the last shipment.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above used oil and universal waste requirements. You should submit your response to Derrick Samaranski, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.”

If you have any questions regarding this letter, please contact Mr. Samaranski, of my staff, at 312-886-7812 or at [Samaranski.Derrick@epa.gov](mailto:Samaranski.Derrick@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Michael Ellenbecker, WI DNR, [Michael.Ellenbecker@wisconsin.gov](mailto:Michael.Ellenbecker@wisconsin.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5, LCD, RCRA BRANCH, LR-8J  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** Baker Manufacturing Company, LLC

**EPA ID No.:** WID006072979

**ADDRESS:** 133 Enterprise Street  
Evansville, Wisconsin 53536

**DATE OF INSPECTION:** February 27, 2015

**EPA INSPECTOR:** Derrick Samaranski  
Environmental Engineer

**PREPARED BY:**

Derrick Samaranski  
Derrick Samaranski  
Compliance Section 2

04/10/15  
Date Completed

**APPROVED BY:**

Julie Morris  
Julie Morris, Chief  
Compliance Section 2

4/15/15  
Date

## **Purpose of Inspection**

This inspection was an evaluation of the Baker Manufacturing Company, LLC's compliance with hazardous waste, used oil, and universal waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as non-generator of hazardous waste.

## **Participants**

Inspector(s):

Derrick Samaranski, Environmental Engineer, EPA

Site Representatives:

Gene Fahrney, Plant Superintendent

## **Introduction**

On February 27, 2015, I arrived at the location of the Baker facility at 9:45 AM, and proceeded to speak with Mr. Fahrney who identified himself as the facility's environmental contact. I presented my official credentials, gave Mr. Fahrney my business card, and explained the purpose of my visit. During the opening conference with Mr. Fahrney, I asked for a description of Baker's operations and a listing of solid and hazardous waste streams generated by the facility.

I informed Mr. Fahrney that Baker could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Mr. Fahrney did not make a CBI claim on the information gathered during the inspection

## **Site Description**

The following information about Baker is based on the personal observations of the U.S. EPA inspector and on representations made during the Inspection by the Facility personnel identified above or within the text or otherwise specified.

Baker primarily manufactures equipment for the residential, municipal and industrial water management markets. Its main products include: ductile and gray iron castings, gears and pumps, well accessories, and filtration products. In addition to the water related markets Baker also manufactures products for the: agricultural, heavy equipment, power generation, industrial and hot oil markets. The company was originally founded in 1873 as a steam engine manufacturer who evolved over decades to specialize in production of equipment for the water management markets. The company has expanded its business through purchases of Haight Pump and Campbell Manufacturing facilities and addition of an Engineering Laboratory Building #35. The

facility occupies 116,000 square feet of area, and employs 125 workers five days a week with foundry operations operated in two shifts. At the time of the inspection Baker identified itself as a non-generator of hazardous waste. Prior to 2012 Baker operated as a large quantity generator of hazardous waste when it operated zinc galvanizing operation which generated hazardous wastes. The zinc galvanizing operation has been decommissioned in 2012 and the buildings housing it demolished and converted into an asphalt topped parking lot. Parts requiring galvanizing are sent to an off-site facility and brought back for finishing and/or assembly.

Manufacturing operations at the facility are divided between foundry/casting/mold and core making in Bldg. #34, assembly/finishing operations located in Bldgs. #2, 3, 5, 6 and 12-14 and support operations located in Bldgs. # 19, 20, and 35. Support operations at the facility include maintenance, tool crib, material storage, waste management, and laboratory testing.

Casting and manufacturing operations at Baker generate bag house dust, used sand, used oil, waste water, used paint, used filters, and universal wastes. Wastes generated by the facility are accumulated in containers ranging from 55-gallons to twenty cubic roll-off boxes.

Baker representatives stated they used process knowledge, analytical testing, and Material Data Safety Sheets (MSDS) to conduct waste determinations of its generated wastes.

### **Site Tour**

The site walk-through of the facility started at 11:31 AM, and began with a visit to the finishing, assembly and support operations of the manufacturing process. We visited pattern making and storage areas (Bldg. #2 and #3), welding and assembly (Bldg. #6), maintenance (Bldg. #19), tool crib (Bldg. #11), yard pump assembly (Bldg. # 13), thread pipe assembly (Bldg. #13), cast staging and stock room (Bldg. #20), paint storage and painting operations (Bldg. #5 and #12).

First, we visited pattern storage and pattern making operations followed by welding and tool crib area. I did not observe hazardous waste accumulation in any of the visited areas. Few solid wastes generated from the pattern making and welding are disposed in to one of the two non-hazardous waste roll-off boxes in Bldg. # 34.

Next, we visited Bldg. #14 where Baker operates a small manual paint booth for coating of gear pumps which are assembled in the same building. According to Mr. Farhney paints used by Baker in the small paint booth as well as the paints used in the dip operation in Bldg. 12 are water based and non-hazardous. Spent filters from the paint booth are disposed to the city of Janesville landfill. Baker uses a limited number of paint colors and only paints select parts. Many of the parts for the gear pumps are purchased through outside suppliers.

In Bldg. #13 Baker assembles yard pumps and threads piping used in the yard pumps. Lubricants are used in the pipe threading operation and adhesive are used to connect certain pump pieces. Mr. Farhney stated that materials used in the production of the yard pumps are mostly used-up in

the assembly process. I did not observe waste generation during our visit to the yard pump manufacturing operation.

After visiting Bldg. #13, we continued the facility walk-through by visiting Bldg. #20, where I inspected Baker's used oil accumulation area. The used oil is generated from forklift and gearbox servicing. I observed storage of one 300-gallon tote and nine 55-gallon drums of used oil. Most of the used oil drums and the tote were locked in a chain-linked cage. Several used oil drums were stored on wooden pallets near the cage. According to Mr. Farhney Baker limits access to the used oil drums to avoid mixing of used oil with other wastes. Most of the observed used oil drums were labeled as "Waste Oil" with the exception of one which was properly labeled as "Used Oil." Baker offers its used oil for disposal to Safety Kleen and oil contaminated materials to CRI.

In Bldg. #12 Baker operates dip coating operation which involves part pre-treatment prior to dip coating and drying. The pre-treatment involves dipping parts in cleaner (Crys Coat 2707FF) tank, water rinse tank, and sealer tank. The pre-treatment system is set-up with an extra 1,000 gallon tank for the accumulation of the waste Crys solution and rinse tank waste water. The pre-treatment waste tank is directly piped to the sewer and is emptied regularly. Mr. Farhney assured me that the local sewer district is aware of the pre-treatment waste discharges. After pre-treatment parts are dip coated, dried and moved to shipping or assembly areas. At the time of our visit to dip coating area, I inspected a flammable locker which was used for storage of touch-up aerosol paint product. Mr. Farhney stated that no aerosol waste was being generated from the use of the aerosol paint as it was being used. Culligan services Baker's pre-treatment de-ionized water system located in Bldg. #12 once a month.

During our visit to Bldg. #5 which Baker uses as a staging area and paint storage area, I observed a tote which was identified by Mr. Farhney as storing waste coolant. The waste coolant is offered for off-site disposal two to three times a year. No other waste accumulation was observed in Bldg. #5.

After visiting Bldg. #5, we visited Baker's maintenance area where I looked at a parts washer which uses a water based solvent. No other waste accumulation was observed in Bldg. #19.

We continued the tour of the facility operations by visiting the foundry and casting operations in Bldg. #34. Baker operates two induction furnaces to melt pig iron, scrap steel, and additives to batch produce its cast products. The facility recently upgraded its power infrastructure to accommodate newer furnaces. Feed materials including the chemical additives are stored near the two furnaces. According to Mr. Farhney Baker foundry operations don't generate hazardous wastes and the slag produced during melting is collected, cooled and disposed as non-hazardous waste on an as needed basis. Cleaning of the induction furnaces produces scrap material which is reused back in the melting process. According to Mr. Farhney used refractory material from the induction furnaces has not been generated yet. Typical melting operation occurs once every one to two hours and produces approximately 5,500 pounds of molten material which is cast in to sand molds and cores. Baker's sand mold and core making operations are located in the same

building as the foundry and casting operations. Baker uses green sand mixture to manufacture its molds and epoxy binder catalyst sand system to produce its cores. Prior to casting some of the molds and cores maybe washed in water based or alcohol solutions to improve casting. According to Mr. Fahrney core and mold wash solutions are used and never disposed. The catalyst used in core making process is sulfur dioxide gas, excess of which has to be stripped from the air after activating the binders in the core sand. To accomplish that Baker operates a small potassium hydroxide scrubber to recapture the sulfur dioxide gas. The scrubber discharges 50 gallons of waste solution per day to the facility's waste water pre-treatment system. In addition to scrubber waste water Bldg. #34 generates waste from the operation of the bag house unit and core and mold wasting. Bag house dust is directly discharged to one of the two roll-off boxes. Solid wastes generated in Bldg. #34 are accumulated in two roll-off boxes which also accumulate maintenance wastes, spent shot blast media, and grinding waste. All of the wastes placed in to two roll-off boxes make-up Baker's foundry waste stream. According to Mr. Fahrney the roll-off boxes of foundry waste are offered for disposal to city of Janesville landfill. The foundry waste is managed as non-hazardous and is tested annually. Baker generates 300 tons of foundry waste per month. The walk-through of the foundry operations ended with a visit to the waste water pre-treatment unit which receives waste waters generated in Bldg. #34. The facility's waste water pre-treatment system consists of a holding tank, and two carbon filters and a secondary filter in series. Used pre-treatment filters are offered for off-site disposal as non-hazardous waste. The waste water discharges from Bldg. #34 are regulated under city of Evansville waste water program and are regularly sampled.

The site walk-through of the facility ended with a visit to universal waste accumulation area located near Bldg. #5 and Engineering Lab Bldg. #35 where Baker conducts testing of pump equipment. During our visit to the universal waste accumulation area, I observed storage of used four foot and eight foot fluorescent lamps in two open plywood boxes. The used four foot lamp box was labeled as "Waste Lamps" whereas the used eight foot lamp box was unlabeled. In addition to the used lamps I also observed accumulation of the used batteries which were stored in a blue recycle container. The used battery container was not properly labeled. No hazardous wastes were being identified as being generated by the Engineering Lab, however oils are used in the testing of the pumps and are collected for disposal. The site walk-through ended at 3:30 PM.

### **Records Review**

For the records review I requested to see the following: hazardous waste manifest records for off-site shipments for the last three years, waste stream determinations, and used oil and universal waste shipment documents.

First, I reviewed Baker's available profiles and analytical results of former and current waste streams which included: spent pickling liquor (galvanizing), waste paint from dip and spray operations, spent activated carbon, foundry waste, waste oil/absorbent materials, and waste oil. Only spent liquor waste stream was identified as being characteristically hazardous (D002), and was last offered for disposal in 2012 after closure of the galvanizing operations.

In addition to waste profiles I also reviewed MSDS for paints and binders used by the facility. I reviewed MSDS for: red primer, black primer, blue enamel, green paint, John Deere primer, Isoset 4454 and 4455 binders, Novaset HP binder and 6010B Novaset co-reactant, and Baker Green Aerosol touch-up paint. With the exception of the Baker Green Aerosol product and Novaset HP binder none of the reviewed MSDS listed potentially hazardous waste constituents or characteristics. Baker Green Aerosol product has the potential of being characteristically hazardous when disposed as it has a flash point of -156 °F, and Novaset HP binder has a pH of 12.5.

Next, I reviewed Baker's available shipping documents for oil contaminated solid waste, universal waste (batteries, lamps, bulbs) and used oil. Oil contaminated wastes are offered to CRI Recycling Services in Woodville, WI at the same time Safety-Kleen/Clean Harbors picks-up Baker's used oil. Last used oil shipment was offered for disposal on 02/5/2015. Baker offers its used oil for disposal once every two months and disposes 225 to 500 gallons of used oil each shipment. Universal waste as well as used electronics are offered by Baker to Midwest Lamp Recycling, Inc. in Madison, WI. Last universal waste shipment from the facility occurred on 04/24/2012. No other universal waste records were available for my review.

Next, I reviewed hazardous 2011 and 2012 waste manifests and analytical analysis results related to the disposal of a shipment of PCB contaminated oil from the facility on 06/24/2014. According to Mr. Farhney Clean Harbors identified through sampling and analysis that Baker's used oil was the source of a PCB contamination of a tanker truck load of used oil which included used oil from other local generators. Baker was responsible for the disposal of the total 23,000 pounds of PCB contaminated used oil shipment as well as the clean-up of the tanker truck and disposal of any PCB residues. As a result of the PCB contamination Baker constructed a locked cage in Bldg. #20 to control access to stored used oil containers and conducts regular testing of its used oil.

### **Closing Conference**

For the inspection close-out conference I gave the facility representative Small Business Resource Sheet and Wisconsin's Solid and Hazardous Waste Education Center (SHWEC) handout. During the closeout conference I discussed Baker's closure of the galvanizing operation, PCB used oil contamination incident, management requirements for used oil and universal waste and waste determination requirements. The inspection of the facility ended at 3:30 PM.

### **Attachments**

- A. Photographs
- B. Checklist(s)
- C. List of Documents Copied/Obtained During Inspection
- D. CD of All Photos Taken During the Inspection

**ATTACHMENT A**  
**Photographs**

**Baker Manufacturing Company, LLC**  
**WID006072979**



**Photograph Number: 1**

**Photographer: Derrick Samaranski**

**Date: 2/27/2015**

**Photograph Description: Caged used oil collection area in Bldg. #20.**

**Baker Manufacturing Company, LLC**  
**WID006072979**



**Photograph Number:** 2

**Photographer:** Derrick Samaranski

**Date:** 2/27/2015

**Photograph Description:** Drums of used oil next to the caged used oil collection area Bldg. #20.

**Baker Manufacturing Company, LLC**  
**WID006072979**



**Photograph Number:** 3

**Photographer:** Derrick Samaranski

**Date:** 2/27/2015

**Photograph Description:** Sample of labeling found on Barker's used oil containers stored in the facility's used oil collection area ("Waste Oil.")

**Baker Manufacturing Company, LLC**  
**WID006072979**



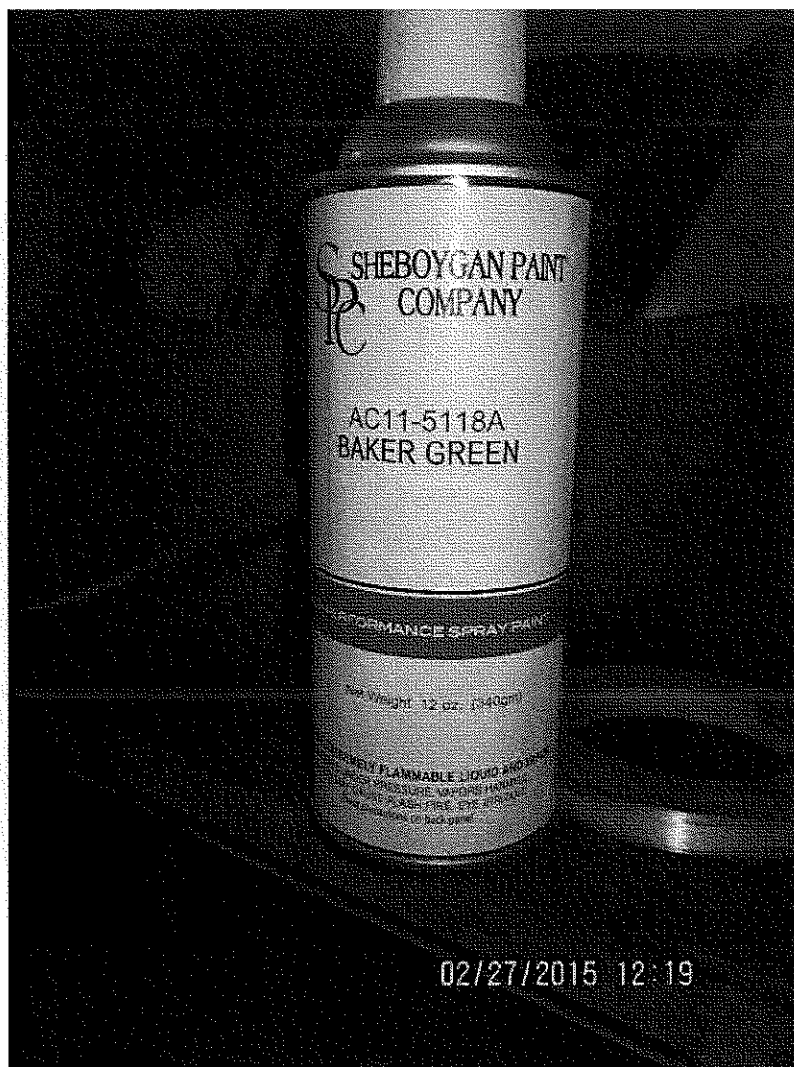
**Photograph Number:** 4

**Photographer:** Derrick Samaranski

**Date:** 2/27/2015

**Photograph Description:** Contents of the fire proof locker located in Bldg. # 12 dip paint operation.

Baker Manufacturing Company, LLC  
WID006072979



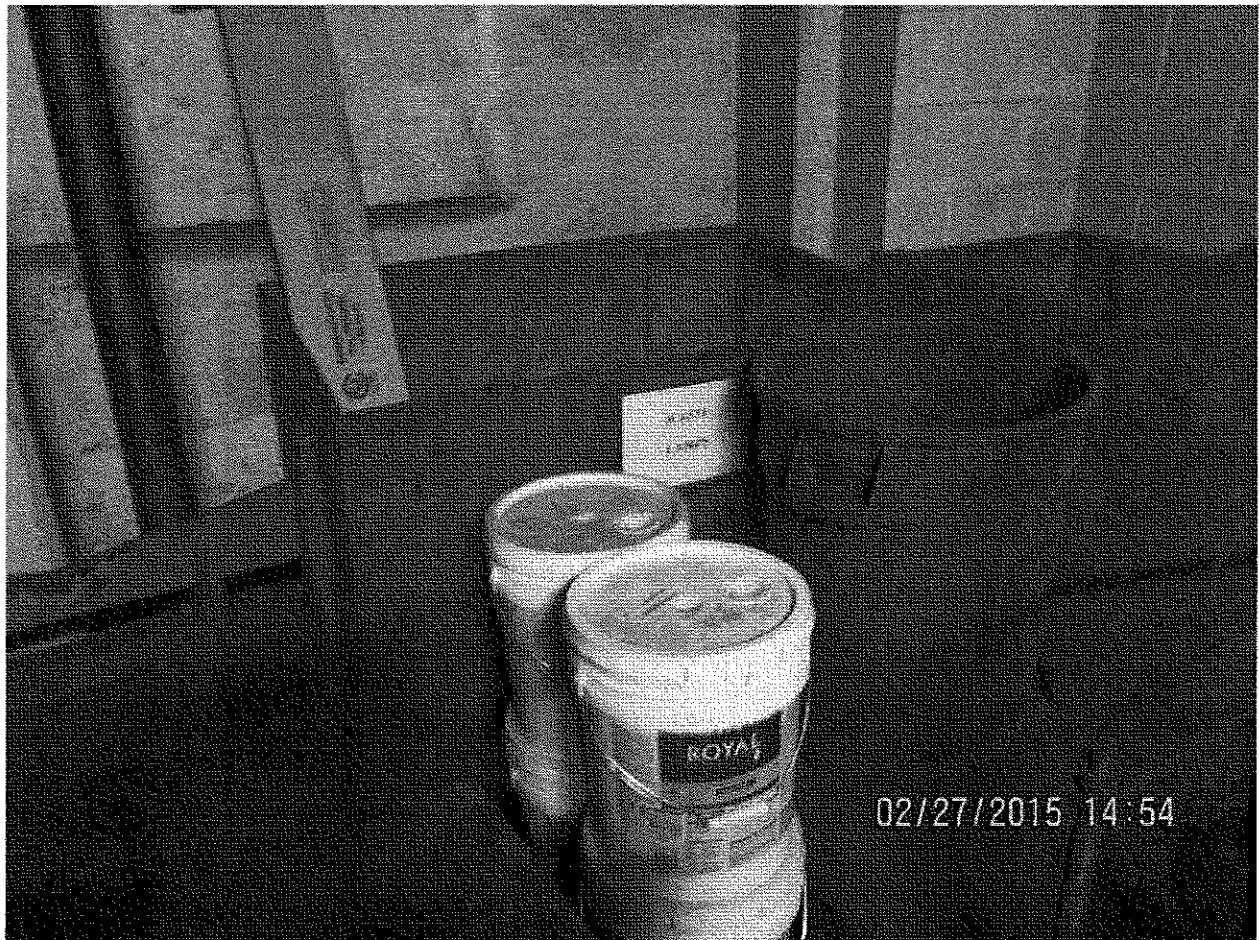
**Photograph Number:** 5

**Photographer:** Derrick Samaranski

**Date:** 2/27/2015

**Photograph Description:** Close-up of the label of the aerosol product found in the fire proof locker in Bldg. #12.

**Baker Manufacturing Company, LLC**  
**WID006072979**



**Photograph Number:** 6

**Photographer:** Derrick Samaranski

**Date:** 02/27/2015

**Photograph Description:** Open plywood boxes accumulating Baker's used 8ft and 4ft fluorescent lamps near Bldg. #5.

**Baker Manufacturing Company, LLC**  
**WID006072979**



**Photograph Number:** 7

**Photographer:** Derrick Samaranski

**Date:** 2/27/2015

**Photograph Description:** Close-up of the unlabeled and open 8ft box of Baker's used fluorescent lamps.

**Baker Manufacturing Company, LLC**  
**WID006072979**



**Photograph Number:** 8

**Photographer:** Derrick Samaranski

**Date:** 02/27/2015

**Photograph Description:** Close-up of the open 4ft box of Baker's used fluorescent lamps showing labeling of the container.

**Baker Manufacturing Company, LLC**  
**WID006072979**



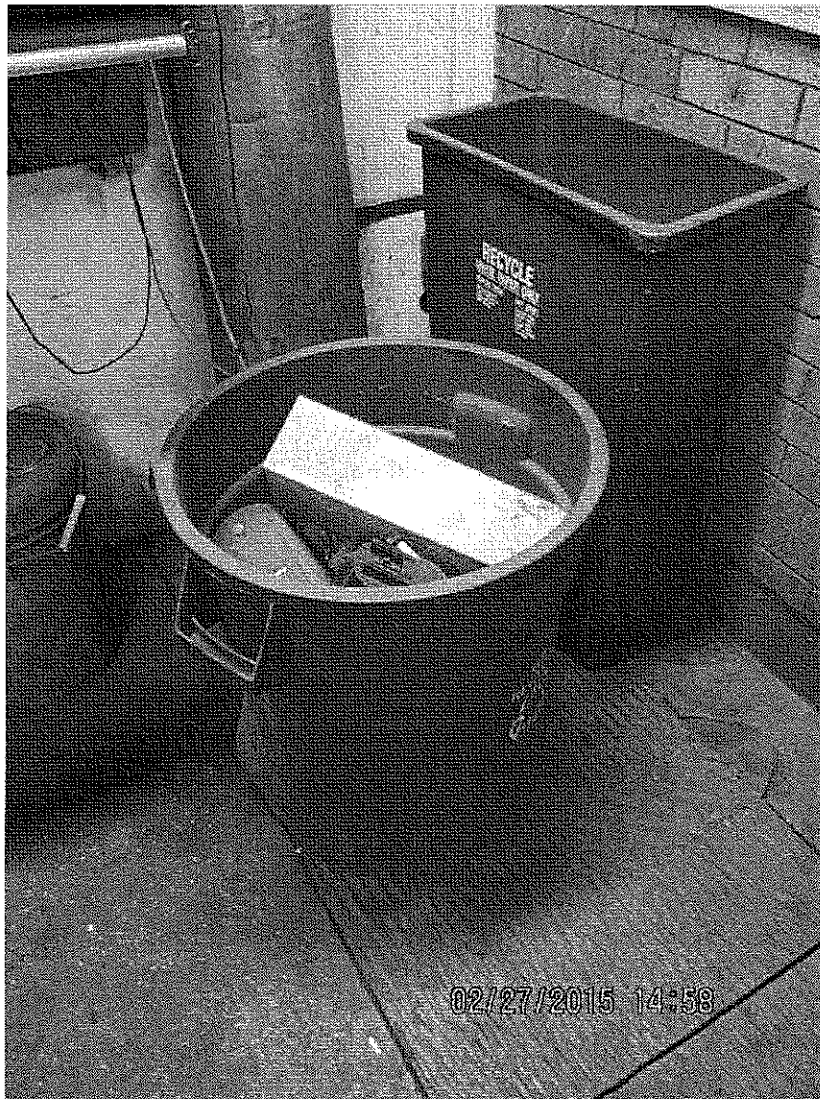
**Photograph Number:** 9

**Photographer:** Derrick Samaranski

**Date:** 02/27/2015

**Photograph Description:** Additional view of the 8ft box storing used fluorescent lamps pictured in photo #7.

**Baker Manufacturing Company, LLC**  
**WID006072979**



**Photograph Number:** 10

**Photographer:** Derrick Samaranski

**Date:** 02/27/2015

**Photograph Description:** Unlabeled container of used batteries in Baker's universal waste storage area.

## ATTACHMENT B

**ATTACHMENT C**  
**Documents Copied**

<b>Document</b>	<b>Date</b>
Copy of the Baker's Site Map	02/27/2015
Copy of Baker's Waste Profiles: Sulfuric Acid Waste, Spent Activated Carbon, Waste Paint, Waste Oil/Absorbent Waste,	02/27/2015
Copy of Baker's MSDS: Red Oxide Paint, Black Primer, Blue Enamel, Green Paint, John Deere Green Primer, Baker Green Aerosol, Isoset 4454 and 4455 Binders, Novaset HP Binder, Novaset 6010B Coreactant	02/27/2015
Copy of Baker's Bill of Lading for a shipment of used oil contaminated debris shipped to CRI (02/05/2015)	02/27/2015
Copy of Baker's Invoice for Disposal of Universal Waste (04/30/2012)	02/27/2015
Copies of last six Safety-Kleen used oil pick-up receipts	02/27/2015
Copies of 2014 Manifests	02/27/2015
Copies of the 2014 PCB Contaminated used oil Analytical Results (2)	02/27/2015



## UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

Revision: 03/27/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

## Section 1: Prohibitions

A. Universal waste is not disposed on-site.	C	673.11(1) Photo <input type="checkbox"/>
B. Universal waste is not diluted or treated on-site.  Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	C	673.11(2) Photo <input type="checkbox"/>

## Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	NA	673.13 Photo <input type="checkbox"/>
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking. (open UV lamp container)	X	673.13 Photo <input type="checkbox"/>
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	NA	673.13(1)(b) Photo <input type="checkbox"/>
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	NA	673.13 Photo <input type="checkbox"/>
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	NA	673.13(3)(b) Photo <input type="checkbox"/>
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	NA	673.13(2) Photo <input type="checkbox"/>
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	NA	673.13(2) Photo <input type="checkbox"/>
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	X	673.14 Photo <input type="checkbox"/>
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	NA	673.14 Photo <input type="checkbox"/>
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	X	673.15(3) Photo <input type="checkbox"/>
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	X	673.15(1) Photo <input type="checkbox"/>



Revision: 03/27/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

### Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	X	673.15(2)	Photo <input type="checkbox"/>
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	X	673.16	Photo <input type="checkbox"/>
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	NA	673.17	Photo <input type="checkbox"/>

### Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	C	673.18(1)	Photo <input type="checkbox"/>
B. Handler that self-transportes complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	NA	673.18(2)	Photo <input type="checkbox"/>
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	NA	673.18(3)	Photo <input type="checkbox"/>
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	C	673.18(4)	Photo <input type="checkbox"/>
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	NA	673.18	Photo <input type="checkbox"/>
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	NA	673.18(7)	Photo <input type="checkbox"/>
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	C	673.18(8)	Photo <input type="checkbox"/>





Revision: 01/23/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## USED OIL GENERATOR - NONHAZARDOUS WASTE HANDLER

This Inspection Form, used for the inspection of facilities that generate used oil, evaluates facility compliance with Wisconsin's Used Oil Rules in ch. NR 679, subch. C, Wis. Adm. Code. A used oil generator is a person, by site, whose act or process produces used oil or whose act first causes used oil to become regulated.

### Section 1: General Requirements

A. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	NA	679.10(2)(a)2 Photo <input type="checkbox"/>
B. Used oil containers and tanks are in good condition and not leaking.	X	679.22(2) Photo <input type="checkbox"/>
C. Used oil containers and tanks are marked "used oil".	X	679.22(3)(a) Photo <input type="checkbox"/>
D. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	C	679.24 Photo <input type="checkbox"/>
E. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	NA	 Photo <input type="checkbox"/>
F. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	NA	679.23 Photo <input type="checkbox"/>
G. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	NA	679.11 Photo <input type="checkbox"/>